



THE PW LAW FIRM

NEW JERSEY

NEW YORK

LLC

March 9, 2021

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
Room 1506
New York, New York 10007

Application granted. The Court adopts the proposed amended motion schedule.

SO ORDERED.

Ronnie Abrams, U.S.D.J.
March 9, 2021

Re: United States v. Mayur Rele,
Southern District of New York
19 Cr. 842 (RA)

Dear Judge Abrams:

Please accept this letter in lieu of a more formal motion for an adjournment of the motion schedule currently set for this matter. This is defendant's second request for an adjournment. This Court granted defendant's first adjournment request dated November 30, 2020. Counsel has conferred with Assistant United States Attorney Kristy Greenberg, who advised that she is no longer assigned to this case. Counsel thereafter conferred with Assistant United States Attorneys Eun Young Choi and Juliana Murray who do not object to this request.

The current motion scheduled provides for defense motions to filed by March 29, 2021. The parties propose the following amended motion schedule: Defense motions due April 30, 2021; Government response due June 1, 2021; Defense reply due June 15, 2021.

The parties do not believe the proposed amended motion schedule will affect the current trial schedule of October 18, 2021, nor the pretrial conference or pretrial submissions schedule. Excluded time has already been granted by this Court, under the Speedy trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A) until October 18, 2021. The basis for this request is set forth below:

1. Discovery Status Update.

The undersigned obtained the discovery from Assistant Federal Defender Ariel Werner on December 28, 2020. The discovery consists of documents and images that are voluminous, in excess of ten terabytes of data. Much of the data is technical in nature. Counsel has been reviewing the discovery and evaluating what, if any, pretrial motions are appropriate. Defendant has also retained a forensic expert to assist in that review. Due to the large volume of information, that review is not yet complete.

2. Adjournment Request.

Accordingly, the undersigned defense counsel respectfully requests this Court grant an adjournment of the current pretrial motions schedule. The Government has no objection to this request. The parties propose the following amended schedule for pretrial motions: Defense pretrial motions due on April 30, 2021, Government responses due on June 1, 2021, and Defense reply due on June 15, 2021.

Respectfully submitted,

/s/ *Paul Wiegartner, Jr.*

Paul Wiegartner, Jr., Esq.
Counsel for Defendant

cc: Kristy J. Greenberg, Esq. (by ECF)
Eun Young Choi, Esq. (via email)
Juliana Murray, Esq. (via email)